

TASMANIAN FARMERS AND GRAZIERS ASSOCIATION SUBMISSION
TO
THE DEPARTMENT OF PRIMARY INDUSTRIES AND WATER REGARDING
THE REVIEW OF PRESCRIBED SHEEP BREEDS IN TASMANIA

June 2009

Purpose and Context of this Submission

The Department of Primary Industries and Water released its Final Report into the Review of Exotic Sheep in Tasmania in December 2008. This submission is the TFGA's response to this Final Report.

This submission will not go back over the valid scientific points raised by the TFGA in previous submissions lodged in 2007 and 2008. However, it should be noted that the TFGA does not believe that the questions raised within its August 2008 submission have been adequately addressed. The TFGA would be happy to discuss these points rationally with the Minister or his relevant staff.

The TFGA also wishes to clarify that the position on prescribed sheep breeds put forward by the TFGA is the TFGA's only position on this matter. The TFGA Meat Council does not have a differing view and in fact formally ratified the TFGA position in 2008.

Process Issue with the State Government Report

The Department of Primary Industries and Water conducted a review of Exotic Sheep in Tasmania in 2008. The finding of this review was: *"Based on the scientific literature and the lack of any new information from stakeholder submissions it is recommended that prescription of the exotic sheep breeds under the regulations of the Animal Farming (Registration) Act 1994 be discontinued."*

The TFGA strongly disagrees with this finding at this stage because of matters pertaining to process.

1. The scientific evidence presented was taken from an existing report that was completed by Dr Kerry Hansford in 2003. The hypothesis behind this report was - is there a risk to the Australian wool clip from contamination by exotic sheep, and if so how can this be managed to ensure that the Australian Wool industry is not devalued.

The DMFR scheme that has consequently been introduced is about identifying these contaminated fibres within a wool clip to ensure buyers get what they pay for thus not devaluing the wool clip. It is in no way a system to manage the risk of contamination to a wool clip from exotic sheep and should not alone be used to determine whether or not exotic sheep in Tasmania should be prescribed.

2. There was no analysis undertaken on the current situation of exotic breeds within Tasmania. This is a major oversight. For example an analysis of the current Tasmanian situation regarding exotic sheep should have been undertaken. Data that should have

been presented could have included size of existing flocks, where they are situated, what do they contribute to the economy, recorded incidences of escapes or contamination.

When the TFGA raised this matter in its August 2008 submission the State Governments response was *“If an audit is required to scope the risk then there must be some uncertainty as to its importance”*. This is not an adequate response to this an inappropriate response to this issue. The TFGA is suggesting that the government should have the best information at hand to make this decision it is not questioning the TFGA uncertainty as to whether or not the exotic breeds are in fact a risk.

Further there are supposedly only 51 exotic sheep flocks in the state. Where is the industry analysis of likely spread of exotic sheep if the proscriptions are removed? Is it likely that they will spread into the more traditional merino country? Extrapolation of figures from Western Australian and New South Wales would suggest that this is highly probable. This information is critical as the issue at hand is the risk of contamination that exotic sheep present. This research would also demonstrate that the State Government have considered the extent of potential risk to the Tasmanian wool industry. Without this information the science of dark and medullated fibres will continue to be debated, rather than the real issue managing the risk of contamination to the wool clip in Tasmania.

It should be noted that the submissions from leading global Wool Processing companies that were submitted with the original negotiations and consultations in establishing the regulations, have not changed and are still valid, with increasing concern at the increased risk of contamination from Exotic breeds as` they proliferate into new Geographic areas. For example they have now infiltrated the New England Region of NSW the largest fine wool producing area of Australia and Tasmania’s main competitor for market share in the premium fine wool arena.

3. The government report states that *“None of the submissions offered new information to either support or oppose regulating the keeping of exotic sheep breeds”*. If this is the case how did the government come to its decision to discontinue the prescription of Exotic breeds, because previously it was this same information that led to the State Government regulating exotic sheep.
4. The TFGA strongly believes that the onus on this review should be demonstrating that exotic sheep do not pose a risk to Tasmania’s internationally renowned wool industry. If the impact of exotic sheep cannot be demonstrated one way or the other the current provisions should remain in place until such a position can be arrived at. Consequently with the governments current position the TFGA would like to see the documentation that clearly demonstrates how the exotic sheep industry has removed all threats to the wool industry. This is a decision that if it is in fact incorrect could have a severe impact on an \$80 Million a year Tasmanian industry.

Other Points for Discussion

1. A lot has happened in other States regarding exotic sheep since the 2003 report was written. In NSW and WA exotic sheep have proliferated. This has led to contamination issues increasing in NSW, which have in turn brought about amendments in March 2009 to the Western Lands Bill regarding fencing.

“One of the purposes of the bill is to enable the Western Lands Commissioner to set standards of fencing and enforce the upgrading of fences to ensure proper containment of stock within property boundaries to prevent contamination of traditional merino or other wool-producing sheep by recently introduced exotic breeds of sheep.” – Ms Katrina Hodgkinson Member for Burrinjuck – Discussion on the Amendment to the Western Lands Amendment Bill March 2009. This is a definite indication that an increase in numbers of exotic sheep in close proximity to wool-producing sheep is becoming a contamination issue. It should not merely be dismissed as a matter of boundary fencing.

2. The matter of Wiltshire Horns in Tasmania continually gets raised as an example of the TFGA’s inconsistency to this issue. It is constantly stated that the TFGA’s response to this is that Wiltshire Horns have been here for a long time so they are alright. This is a very narrow interpretation of the TFGA’s view. The TFGA agrees that potentially they pose a risk but as they have been in Tasmania for over twenty years the industry for Wiltshire Horns is understood.

The fact is:

- i) Wiltshire Horns have not proliferated and it is unlikely that their numbers will increase in Tasmania;
- ii) They have not intruded into the main wool producing areas;
- iii) Because of their foraging habits they are easier to contain than the exotic breeds; and
- iv) Wiltshire Horns are not prolific shedders until the 3rd or 4th cross, consequently they pose a major lower contamination risk to the wool clip.

The TFGA would be happy for the State Government to undertake an industry review of the Wiltshire Horns to address this matter and nullify the argument that Wiltshire Horns are being treated differently.

3. It has been put to the TFGA that the prescribing of exotic breeds is anti-competitive and no other state has taken this approach. The TFGA would like to point out that the State Government has taken a similar approach to GMO’s and NZ Apples as it

has with Exotic Sheep. In May 2009 the Tasmanian Parliament passed a Bill to extend the ban on the release of genetically modified organisms to the environment for at least another five years under a Bill passed by Parliament today.

In Media relating to this decision the Minister for Primary Industries and Water, David Llewellyn, made the following statements.

"Tasmania's GMO-free status is a vital factor for our primary producers, helping them realise their full potential in international and interstate markets," Mr Llewellyn said.

"The decision by some other Australian states to relax their GM bans has actually increased the value of Tasmania's GMO-free status.

"It provides us with opportunities for even better Tasmanian access to prime markets.

"The hard work done over recent years has ensured that Tasmania is well placed to take full advantage of its reputation as a reliable supplier of the best and safest food."

The TFGA would suggest that that the prescribing of Exotic Sheep would do exactly the same thing for Tasmania's wool industry as was evident in the submissions from wool buyers to the review process. Further the banning of GMO's to stop them from escaping into the environment and contaminating non-gmo crops is an exceptionally similar situation to that of exotic sheep contaminating wool-producing sheep.

The TFGA would also argue that the banning of New Zealand Apples into the State because of the risk that fire blight posed to the existing Tasmanian apple industry is also a similar situation. The TFGA strongly believes that these precedents add weight to the points raised in this submission.

4. The foraging nature of exotic breeds also brings environmental and management issues. The Exotic Breeds, (Dorpers, Damarras, Awassais) are browsers and foragers and their grazing habits are akin to Goats rather than sheep. This means that they pull pasture and plants out by the roots leading to a landscape that is more susceptible to erosion, decreased water quality and potential biodiversity decline if they forage in native forest. If this foraging behaviour was present on the more fragile soils within Tasmania there is a very real possibility that environmental degradation could occur. It should be noted that it is also this foraging behaviour that leads to the containment issues of exotic breeds. They are more persistent at getting through fences than other breeds consequently why the boundary fencing issue is not simply about strengthening fences.

Enforcing the Code of Practices

It is clear that the current code of practice relating to prescribed sheep breeds should remain in place to protect Tasmania's valuable wool industry. Consequently, it is terribly important that the Code of Practice is enforced appropriately within the State. The State Government is responsible for ensuring that on selling and cross breeding of exotic sheep is done in accordance with the code of practice. This means the appropriate tagging of exotic sheep and the offspring. It should not matter that after the 2nd or 3rd cross that exotic sheep cannot be identified visually as their ear tags should clearly display the nature of the cross.

The TFGA would like to discuss this matter further with the State government to ensure that this valuable step in prescribing exotic breeds results in better market potential for Tasmania's wool industry.